

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG Philips LCD Co.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
Tatung Co., Tatung Company of America Inc.,	)	C.A. No. 04-343-JJF
and Viewsonic Corp.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	
	)	

**SUPPLEMENTAL NOTICE OF SERVICE OF SUBPOENA**

To:	Richard D. Kirk, Esquire The Bayard Firm 222 Delaware Avenue #900 Wilmington, DE 19899	Scott R. Miller, Esquire Tracy R. Roman, Esquire Bingham McCutchen 355 S. Grand Avenue, 44 <sup>th</sup> Floor Los Angeles, CA 90071
	Daniel G. Jarcho, Esquire Cass W. Christenson, Esquire Lora A. Brzezynski, Esquire Matthew T. Bailey, Esquire McKenna Long & Aldridge LLP 1900 K Street, N.W. Washington D.C. 20006	Richard L. Horwitz, Esquire David E. Moore, Esquire Potter Anderson & Corroon LLP 1313 N. Market Street Hercules Plaza, 6 <sup>th</sup> Floor Wilmington, DE 19899

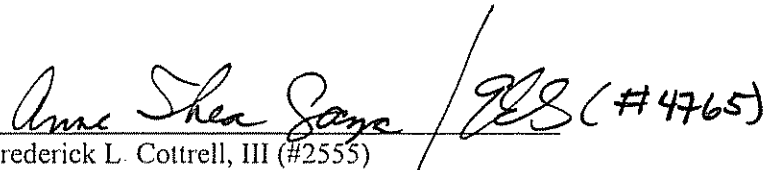
PLEASE TAKE NOTICE that on June 13, 2006, Defendant Tatung Company issued the attached subpoena for service on NEC Electronic America, Inc., c/o C T Corporation System, 818 West Seventh Street , Los Angeles, CA 90017.

Of Counsel:  
Christopher Darrow  
Mark H. Krietzman  
Frank E. Merideth, Jr.  
Alan R. Maler  
Valerie W. Ho  
Greenberg Traurig LLP  
2450 Colorado Avenue, Suite 400E  
Santa Monica, CA 90404  
Telephone: 310-586-7700

Kathryn L. Clune  
Greenberg Traurig LLP  
800 Connecticut Avenue, N.W., Suite 500  
Washington, DC 20006

Eric S. Tautfest  
Greenberg Traurig, P.A.  
2200 Ross Avenue, Suite 4700E  
Dallas, Texas 75201

Dated: June 23, 2006

  
Frederick L. Cottrell, III (#2555)  
Anne Shea Gaza (#4093)  
Richards, Layton & Finger, P.A.  
One Rodney Square  
P.O. Box 551  
Wilmington, Delaware 19899  
(302) 651-7700  
cottrell@rlf.com  
gaza@rlf.com  
Attorneys for Defendant Tatung Co. and Tatung  
Company of America Inc

AO 88 (Rev 11/94) Subpoena in a Civil Case

Issued by the  
**UNITED STATES DISTRICT COURT**  
 CENTRAL DISTRICT OF CALIFORNIA

LG Philips LCD Co , Ltd

v

Tatung Company, Tatung Company of America Inc , and Viewsonic Corp

**SUBPOENA IN A CIVIL CASE**Case Number:<sup>1</sup> 04-343-JJF  
District of DelawareTO: NEC Electronic America, Inc  
c/o C T Corporation System  
818 West Seventh St.  
Los Angeles, CA 90017

- ☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

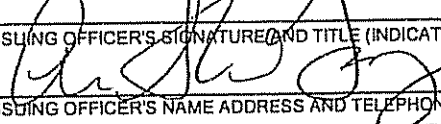
- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): See Attachment A.

PLACE Richards, Layton & Finger, P A , One Rodney Square, 920 North King Street, Post Office Box 551, Wilmington, Delaware 19899-0551	DATE AND TIME June 26, 2006; 10:00 a m
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- ☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify Federal Rules of Civil Procedure, 30(b)(6)

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT) 	DATE June 13, 2006
ISSUING OFFICER'S NAME ADDRESS AND TELEPHONE NUMBER Anne Shea Gaza, Esq , Richards Layton & Finger, P A , One Rodney Square, 920 North King Street, Post Office Box 551, Wilmington, Delaware 19899-0551	

(See Rule 45, Federal Rules of Civil Procedure parts C &amp; D on reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number

Attorney or Party without Attorney: RICHARDS LAYTON & FINGER, P A 920 N. KING ST. WILMINGTON, DE 19899 Telephone No:				For Court Use Only	
Attorney for:					
Insert name of Court, and Judicial District and Branch Court: United States District Court - Central District Of California					
LG PHILIPS LCD CO, LTD TATUNG COMPANY					
<b>PROOF OF SERVICE SUBPOENA IN A CIVIL</b>		Hearing Date:	Time:	Dept/Div:	Case Number: 04-343-JJF

1. At the time of service I was at least 18 years of age and not a party to this action

2. I served copies of the SUBPOENA IN A CIVIL CASE

3 a. Party served: NEC ELECTRONIC AMERICA, INC.  
 b. Person served: MARGARET WILSON, CLERK AT C.T. CORPORATION SYSTEMS,  
 AUTHORIZED AGENT

4 Address where the party was served: C.T. CORPORATION SYSTEMS  
 818 W. 7TH ST.  
 LOS ANGELES, CA 90017

5 I served the party:  
 a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on: Tue, Jun. 13, 2006 (2) at: 3:00PM

7. Person Who Served Papers:

a. GUSTAVO GONZALEZ HUERTA  
 b. PROCOURIER, INC.  
 1706 S. FIGUEROA ST.  
 LOS ANGELES, CA 90015  
 c. 213-481-8100

Recoverable Cost Per CCP 1033 5(a)(4)(B)

d. The Fee for Service was:

e. I am: (3) registered California process server  
 (i) Employee  
 (ii) Registration No.: 5324  
 (iii) County: Los Angeles

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: Wed, Jun. 14, 2006

**Attachment A - NEC**

**Instructions**

1. If you object to any part of a request and refuse to answer that part, state your objection and answer the remaining portion of that request. If you object to the scope or time period of a request and refuse to answer for that scope or time period, state your objection and answer the request for the scope or time period you believe is appropriate (including in your answer a specific statement as to why you believe the scope or time period is inappropriate).
2. If any of the following requests cannot be answered in full after exercising due diligence to secure the information, please so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information you have concerning the unanswered portions. If your answer is qualified in any particular, set forth the details of such qualification.
3. You must produce all documents responsive to these requests which are in your actual or constructive possession, custody or control, including all documents within the actual or constructive possession, custody or control of any representative, agent, employee, attorney, accountant, investigator or any person acting for you or on your behalf.
4. All documents are to be produced as they are kept in the usual course of business, in the files in which such documents have been maintained, and in the order within each file in which such documents have been maintained; or all documents shall be organized and labeled to correspond with the requests below. All documents are to be produced along with copies of the file folders in which they are kept.
5. If, in responding to the requests, you claim that there is any ambiguity in either a particular request or in a definition or an instruction applicable thereto, such claim shall not be used by you as a basis for refusing to respond, but you shall set forth as part of the response the language deemed to be ambiguous and the interpretation chosen or used in responding to the particular request.

6. For purposes of interpreting or construing the following requests, the terms used are to be given their most expansive and inclusive interpretation unless otherwise specifically limited in the document request itself. This includes, without limitation, the following:

- a. Construing the words “and” and “or” used in any document request in the disjunctive or conjunctive as necessary, to make the document request more inclusive;
- b. Construing the words “any” and “all” used in any document request to mean “any and all” as necessary to make the document request more inclusive;
- c. Construing the singular form of any word to include the plural and the plural form to include the singular; and
- d. Construing the masculine form to include the feminine and/or the gender neutral form.

7. Electronic records and computerized information are to be produced in an intelligible format together with a description of the system from which it is derived sufficient to permit rendering the material intelligible.

#### **Definitions**

1. The term “relating to” means referring to, regarding, evidencing, describing, supporting, refuting, and/or constituting.

2. The term “document” or “documents” means and includes any kind of written, typewritten or printed materials; any tangible recording of any form of statement, communication or representation; and all other data compilation from which information can be obtained (translated, if necessary, by you through detection devices into reasonably usable form) including, but not limited to, writings and all non-identical copies and drafts thereof, notes, memoranda, letters, calendars, appointment books, diaries, notes or minutes of meetings or conversations, catalogs, written agreements, microfilm, graphs, charts, drawings, plans, computer discs, computer tapes, computer cards, computer printouts, tape and sound records, photo records, inter-office communications, reports, photographs, cables, telegrams, telexes, account

books, ledger sheets, canceled checks, invoices, bills, receipts, financial statements or any other form of "writing" as defined in Federal Rule of Evidence 1001.

3. The term "LCD panel" means a device with liquid crystals between substrates.

4. The term "Display" means a device that contains at least one frame, a backlight, and an LCD panel.

5. The term "mounting hole" means a hole, such as a screw hole, used for mounting or attaching a device containing an LCD panel to equipment or to another component, such as a housing.

6. The term "communications" means every manner of disclosure, transfer or exchange of information, whether person to person, in a group, orally, in writing, by telephone, by electronic transmission, or otherwise, including letter or other correspondence, electronic mail, telephone message, memorandum, or telegram.

7. The term "APC" means American Panel Corporation, its parent companies, subsidiaries, and affiliated companies including, but not limited to, Universal Avionics Systems Corporation ("UASC"), and Avionics Displays Corporation ("ADC").

8. The term "LPL" means LG Philips LCD Co., its parent companies, subsidiaries, and affiliated companies including, but not limited to, L.G. Philips LCD, LG LCD, LG Group, LG Electronics, Inc., Lucky Goldstar, , Ltd., or Royal Philips Electronics.

9. The term "NEC" means NEC Corporation, its parent companies, subsidiaries, and affiliated companies including, but not limited to, NEC Electronics Corporation, NEC Display Solutions of America, Inc., and NEC Electronics America, Inc.

#### **Documents to be Produced**

1. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35 that were created, dated, published or disseminated prior to April 2, 1998.

2. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35 that were created, dated, published or disseminated prior to April 2, 1997.

3. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35 that were created, dated, published or disseminated prior to April 2, 1996.

4. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display module with model number NL3224AC35 that were created, dated, published or disseminated prior to April 2, 1995.

5. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model numbers NL3224AC35-01 that were created, dated, published or disseminated prior to April 2, 1998.

6. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-01 that were created, dated, published or disseminated prior to April 2, 1997.

7. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-01 that were created, dated, published or disseminated prior to April 2, 1996.

8. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-01 that were created, dated, published or disseminated prior to April 2, 1995.

9. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-02 that were created, dated, published or disseminated prior to April 2, 1998.

10. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-02 that were created, dated, published or disseminated prior to April 2, 1997.



11. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-02 that were created, dated, published or disseminated prior to April 2, 1996.

12. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-02 that were created, dated, published or disseminated prior to April 2, 1995.

13. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-03 that were created, dated, published or disseminated prior to April 2, 1998.

14. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-03 that were created, dated, published or disseminated prior to April 2, 1997.

15. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-03 that were created, dated, published or disseminated prior to April 2, 1996.

16. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-03 that were created, dated, published or disseminated prior to April 2, 1995.

17. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-04 that were created, dated, published or disseminated prior to April 2, 1998.

18. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-04 that were created, dated, published or disseminated prior to April 2, 1997.

19. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-04 that were created, dated, published or disseminated prior to April 2, 1996.

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21. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-05 that were created, dated, published or disseminated prior to April 2, 1998.

22. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-05 that were created, dated, published or disseminated prior to April 2, 1997.

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25. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-06 that were created, dated, published or disseminated prior to April 2, 1998.

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29. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-07 that were created, dated, published or disseminated prior to April 2, 1998

30. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-07 that were created, dated, published or disseminated prior to April 2, 1997.

31. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-07 that were created, dated, published or disseminated prior to April 2, 1996.

32. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-07 that were created, dated, published or disseminated prior to April 2, 1995

33. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-08 that were created, dated, published or disseminated prior to April 2, 1998.

34. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-08 that were created, dated, published or disseminated prior to April 2, 1997.

35. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-08 that were created, dated, published or disseminated prior to April 2, 1996.

36. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-08 that were created, dated, published or disseminated prior to April 2, 1995

37. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-09 that were created, dated, published or disseminated prior to April 2, 1998.

38. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-09 that were created, dated, published or disseminated prior to April 2, 1997.

39. The Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-09 that were created, dated, published or disseminated prior to April 2, 1996.

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41. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-10 that were created, dated, published or disseminated prior to April 2, 1998.

42. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-10 that were created, dated, published or disseminated prior to April 2, 1997.

43. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-10 that were created, dated, published or disseminated prior to April 2, 1996.

44. Assembly drawings, technical specifications, diagrams, and/or manuals for the NEC Display with model number NL3224AC35-10 that were created, dated, published or disseminated prior to April 2, 1995.

45. Documents sufficient to show all NEC backlit Displays that were sold or offered for sale in the United States for the period of January 1991 to April 1998, such as product lists or sell sheets.

46. Assembly drawings, specifications, diagrams and/or manuals for all NEC backlit Displays that were sold or offered for sale in the United States prior to April 2, 1998 that have one or more mounting holes on the back side of the LCD modules used in the Displays.

47. All documents relating to sales of, or offers to sell, the NEC Display with model number NL3224AC35 to the LG Group, LG Electronics, Inc., Lucky Goldstar, LG Philips LCD Co., Ltd., or Royal Philips Electronics

48. All communications with LPL relating to U.S. Patent No. 6,498,718.

49. All communications with LPL relating to U.S. Patent No. 6,501,641.

50. All documents relating to licensing discussions with LPL.

51. All NEC specifications, drawings, diagrams, manuals, and LCD modules or LCD Displays that were provided to LPL prior to April 2, 1998.

52. All documents relating to products which use the NEC TFT-LCD module with a model number that includes NL3224AC35

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UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2006 I caused to be served by hand delivery the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

Richard D. Kirk, Esquire  
The Bayard Firm  
222 Delaware Avenue #900  
Wilmington, DE 19899

Richard L. Horwitz, Esquire  
David E. Moore, Esquire  
Potter Anderson & Corroon LLP  
1313 N. Market Street  
Hercules Plaza, 6<sup>th</sup> Floor  
Wilmington, DE 19899

I hereby certify that on June 23, 2006 I caused to be sent by Federal Express the foregoing document to the following non-registered participants:

Daniel G. Jarcho, Esquire  
Cass W. Christenson, Esquire  
Lora A. Brzezynski, Esquire  
Matthew T. Bailey, Esquire  
McKenna Long & Aldridge LLP  
1900 K Street, N.W.  
Washington D.C. 20006

Scott R. Miller, Esquire  
Tracy R. Roman, Esquire  
Bingham McCutchen  
355 S. Grand Avenue, 44<sup>th</sup> Floor  
Los Angeles, CA 90071



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Gregory E. Stuhlman (#4765)  
Stuhlman@rlf.com  
Richards, Layton & Finger, P.A.  
One Rodney Square  
P.O. Box 551  
Wilmington, Delaware 19899  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701